

STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

In accordance with Section 222 of the Communications Act and the Federal Communications Commission's ("FCC") CPNI Rules (47 C.F.R. § 64.2001, et seq.), Tresta, Inc. ("Tresta") files this Statement of Policy outlining the Company's procedures for accessing, using and storing Customer Proprietary Network Information ("CPNI").

Tresta provides telecommunications services to retail and wholesale customers. Because Tresta may access, use, or store CPNI when providing these types of services, the Company undertakes the steps outlined in this Statement of Policy to protect CPNI from unauthorized access or misuse.

Definition of CPNI

Under federal law, CPNI is certain customer information obtained by a telecommunications provider during the course of providing telecommunications services (including interconnected VoIP) to a customer. This includes information relating to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier.

Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.

Use of CPNI

It is the policy of Tresta not to use CPNI for any activity other than as permitted by applicable law. Any disclosure of CPNI to other parties (such as affiliates, vendors and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by Tresta to the customer. Except in instances where Tresta is required by law to disclose CPNI, such as through subpoenas or other requests by law enforcement officials, or if the intended use is permitted by FCC Rules, Tresta will first obtain the customer's consent prior to using or sharing CPNI.

Wholesale Services

With regards to wholesale services, Tresta typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service. Nevertheless, the company will follow all CPNI policies outlined within the Statement of Policy, to the extent applicable to its wholesale services.

Disclosure of CPNI

Tresta prohibits the release of CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances.

- When the customer has pre-established a password;

campaign.

Tresta will also implement a system to obtain prior approval and informed consent from its customers in accordance with the CPNI Rules. This system will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

Prior to commencement of a sales or marketing campaign that utilizes CPNI, Tresta will establish the status of a customer's CPNI approval. The following sets forth the procedure that will be followed by the Company:

- Prior to any solicitation for customer approval, Tresta will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- Tresta will use opt-in approval for any instance in which Company must obtain customer approval prior to using, disclosing or permitting access to CPNI.
- A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
- Records of approvals are maintained for at least one year.
- Tresta provides individual notice to customers when soliciting approval to use, disclose or permit access to CPNI.
- The CPNI notices sent by Tresta comply with FCC Rule 64.2008(c).

Tresta will also establish a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one (1) year.

FCC Notification

The Company is prepared to provide written notice within five (5) business days to the FCC of any instance where the opt-in mechanisms do not work properly or to such a degree that consumers' inability to opt-in is more than an anomaly.

Third Party Use of CPNI

To safeguard CPNI, prior to allowing joint venturers or independent contractors access to customers' individually identifiable CPNI, Tresta will require all such third parties to enter into a confidentiality agreement that ensures compliance with this Statement of Policy. Tresta shall also obtain opt-in consent from a customer prior to disclosing the information to such third parties for marketing purposes. In addition, Tresta requires all outside agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.

Tresta requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.

Tresta does not market or sell CPNI information to any third party.

Law Enforcement Notification of Unauthorized Disclosure

If an unauthorized disclosure of CPNI occurs, Tresta shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").

Tresta, Inc.

**Annual CPNI Certification
47 C.F.R. § 64.2009(e)
EB Docket No. 06-36**

COMPANY NAME: Tresta, Inc.

REPORTING PERIOD: January 1, 2015 - December 31, 2015

FILER ID: 830857

OFFICER: Jaclyn Gonzalez

TITLE: Vice President, Operations

I, Jaclyn Gonzalez, hereby certify that I am an officer of Tresta, Inc. ("Tresta") and that I am authorized to make this certification on behalf of Tresta. I have personal knowledge that Tresta has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Tresta or to any of the information obtained by Tresta. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Tresta employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Tresta or to the information obtained by Tresta.

Signed: Jaclyn Gonzalez

On behalf of Tresta, Inc.

Date: 2/29/16